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**Selendy
& Gay**

March 25, 2020

Via ECF

Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

Re: *Hyland, et al. v. Navient Corp., et al.*, No. 1:18-cv-09031

Dear Judge Cote:

Pursuant to Your Honor's Individual Practice Rule 1.E, the parties in the above-captioned matter respectfully request an extension of Plaintiffs' deadline to serve their motion for preliminary approval by four weeks—from March 27, 2020 until April 24, 2020.

The parties have not previously requested an extension of Plaintiffs' deadline to serve that motion. Since informing the Court of their memorandum of understanding, the parties have been working diligently to finalize a formal settlement agreement and to prepare all of the documents that will be included in the preliminary approval motion. In light of the current COVID-19 crisis and related developments concerning student loans requiring urgent attention, however, the parties are unable to secure client approval on certain remaining items by the current deadline. The parties will endeavor to submit the motion and accompanying documents as quickly as possible.

Absent unforeseen circumstances related to COVID-19, the parties do not expect to request an additional extension and are committed to facilitating prompt adjudication of this action.

Hon. Denise L. Cote
March 25, 2020

The parties are available at the Court's convenience should the Court have any questions.

Respectfully submitted,

/s/ Lena Konanova

Lena Konanova

Cc: Defendants' counsel (by ECF)